



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

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In Reply Refer To: 3RC30

MAY 17 1983

John L. Doyle, Esquire
Law Department
Reynolds Metals Company
6601 West Broad Street
Richmond, VA 23261

Re: Southern Gravuer
VAD 980552285
EPA Inspection

Dear Mr. Doyle:

I am writing concerning the Environmental Protection Agency's ("EPA's") attempted inspection of Southern Gravuer Service, Inc. in Richmond, Virginia, a subsidiary of Reynolds Metals. As I advised you in our conversation of May 6, Southern Gravuer denied EPA representatives access to the Richmond facility on March 3, 1983. EPA representatives were attempting to inspect the facility to determine its compliance status under the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. ("RCRA"), and the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9601 et seq. ("CERCLA").

As I advised you in our conversation, the Resource Conservation and Recovery Act legislative history clearly specifies that 'representatives' of EPA with authority to make inspections include contractors. See page 3 of Senate Report No. 96-172, which can be found in the 1980 U.S. Code Cong. & Ad. News 5019.

I understand that Reynold's primary concern is in ensuring the confidentiality of information viewed by EPA's contractors. I am therefore enclosing for your review the relevant excerpts of EPA's contract with NUS Corporation, our representatives at the proposed inspection, which provide that NUS must keep information confidential. Please review these excerpts - I believe they will satisfy your concerns with regard to confidential information.

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PLEASE contact me subsequent to your review, and we can discuss arrangements for the inspection of Southern Gravure. I can be reached at (215) 597-8543. Thank you for your attention to this matter.

Sincerely,

HS/

Heather Gray
Attorney, Office of Regional Counsel

Enclosure